

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE :
 :
GEORGE AND DOLORES STARETZ : CHAPTER 13
Debtors. :

DEUTSCHE BANK NATIONAL TRUST :
COMPANY, AS TRUSTEE, IN TRUST :
FOR THE REGISTERED HOLDERS OF :
MORGAN STANLEY ABS CAPITAL I :
INC., TRUST 2006-HE7M MORTGAGE :
PASS-THROUGH CERTIFICATES, :
SERIES 2006 HE7 :
 :
Movant, :
 :
vs. :
GEORGE AND DOLORES STARETZ : CASE NO. 19-14972
 :
Respondents. :

**DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, George and Dolores Staretz, the Debtors, and files an Answer to
Deutsche Bank's Motion for Relief From the Automatic Stay:

1. George and Dolores Staretz (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Eastern District of Pennsylvania.
2. Movant alleges that Debtors have failed to make post-petition mortgage payments.
3. George Staretz suffered severe health problems, which resulted in the default in the monthly payments. Debtors' filed an Amended Chapter 13 Plan on June 28, 2020 which included post-petition payments to the Movant for December 2019 through May 2020.

4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

5. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to cure the arrears by including them in an amended Plan, or in the alternative over a six month period.

WHEREFORE, the Debtors respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: July 22, 2020 .

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CHAPTER 13

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 22, 2020, he caused a true and correct copy of Debtor's Answer to Deutsche Bank's Motion for Relief from the Automatic Stay to be served Via electronic filing in the above-referenced case, on the following:

Scott Waterman, Esq. at ECFMail@readingCg13.com

Rebecca A. Solarz, Esq. at bkgroup@kmlawgroup.com

Dated: July 22, 2020

/s/Tullio DeLuca
Tullio DeLuca, Esquire